

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re:

Abdoun Holding Estates, LLC
A Michigan Limited Liability Company

Case No. 21-48063

Debtor

Abdoun Holding Estates, LLC
A Michigan Limited Liability Company

Plaintiff,

v.

Oudia Abdulnoor and
Midwest Hospitality Services, LLC

Defendants.

**NOTICE OF REMOVAL UNDER FEDERAL RULE OF
BANKRUPTCY PROCEDURE 9027 AND 28 U.S.C. SECTION 1452(a)**

NOW COMES, Abdoun Holding Estates, LLC, by and through its attorneys, OSIPOV
BIGELMAN, P.C. and state as follows:

1. The Debtor filed a Voluntary Petition under Chapter 11 of the United States Bankruptcy Court (the “Code”) on October 11, 2021 (the “Petition Date”). The Voluntary Petition was filed in the United States Bankruptcy Court for the Eastern District of Michigan, Southern Division, Case No. 21-48063.

2. Prior to the Petition Date, Abdoun Holding Estates, LLC, (“Debtor”) filed a Complaint in the Oakland County Circuit Court for the State of Michigan, Case No. 2019-177667-CB (the “Action”), against Oudia Abdulnoor and Midwest Hospitality Services, LLC. In the Complaint, Debtor seeks to recover damages against Defendants.

3. Pursuant to Federal Rule of Bankruptcy Procedure 9027 and 28 U.S.C. Section 1452(a), the Debtor may remove this Action to this Court. Notice of Removal is timely pursuant to Federal Rule of Bankruptcy Procedure 9027(a)(2).

4. The United States District Court for the Eastern District of Michigan has jurisdiction over this case pursuant to 28 U.S.C. Section 1334(b) because the Action is related to Debtor's Chapter 11 bankruptcy case. This matter is a core proceeding under 28 U.S.C. Section 157(b), in which the United States Bankruptcy Courts may enter final orders and judgment, because, among other things, it involves "matters concerning the administration of the estate" and because it affects "the liquidation of the assets of the estate or the adjustment of the debt-or creditor...relationship." *See* 28 U.S.C. § 157(b)(2)(A) and (O).

5. To the extent this matter is deemed to be Constitutionally non-core, Debtor consents to entry of final orders and judgments by the Bankruptcy Court. *Wellness International Network, Ltd. v. Sharif*, 575 US 665, 135 S. Ct. 1932, 2015 WL 2456619 (2015).

6. Copies of all pleadings and processes in the removed action are attached.

Respectfully Submitted:

OSIPOV BIGELMAN, P.C.

/s/ Thomas D. DeCarlo
Yuliy Osipov (P59486)
Anthony Miller (P71505)
Thomas D. DeCarlo (P65330)
Attorneys for Abdoun Holding Estates, LLC.
20700 Civic Center Drive, Ste. 310
Southfield, MI 48076
Tel: (248) 663-1800 / Fax: (248) 663-1801
yo@osbig.com, am@osbig.com, tdd@osbig.com

Dated: October 25, 2021